

**NATIONAL AERONAUTICS AND SPACE ADMINISTRATION  
JOHN C. STENNIS SPACE CENTER (SSC)  
OFFICE OF PROCUREMENT (OP)  
STENNIS SPACE CENTER, MS 39529-6000**

**JUSTIFICATION FOR OTHER THAN FULL AND OPEN COMPETITION  
RECOMMENDATION AND DETERMINATION TO  
SOLICIT FOR BRAND NAME**

**1.0 AGENCY/CONTRACTING ACTIVITY**

National Aeronautics and Space Administration, John C. Stennis Space Center, Office of Procurement, Stennis Space Center, MS 39529

**2.0 DESCRIPTION OF THE ACTION BEING APPROVED**

The action to be approved is the brand name purchase of AK-225G/HCFC225-G cleaning solvent. This requirement is considered to be a commercial item, as the subject compound is a commercially available solvent used in a number of commercial industrial applications. It is anticipated that this requirement will be provided via call(s) issued under a Blanket Purchase Agreement (BPA) under the authority of FAR Parts 12 and 13. It is anticipated that two BPAs will be written to enhance competition and provide adequate sourcing for receipt of the product. The estimated period of performance or lead-time for delivery is from award through October 31, 2014.

**3.0 DESCRIPTION**

The work to be performed under this requirement shall consist of the supply and delivery of a maximum quantity of one hundred (100) fifty-five (55) gallon drums of AK-225G/HCFC225-G cleaning solvent. The total estimated cost of this requirement is not to exceed \$3,000,000.00.

**4.0 STATUTORY AUTHORITY**

The statutory authority permitting other than full and open competition is FAR 6.302-1(c) and 10 U.S.C. 2304 (c)(1), as there is only one brand capable of meeting the Government's performance requirements and no other supplies or services will satisfy agency requirements. The use of a brand name description in this acquisition, therefore, is essential to the Government's requirement, and thereby precludes consideration of a product manufactured or supplied by another company.

**5.0 NATURE OF THE ACTION THAT REQUIRES USE OF THE AUTHORITY CITED**

This recommendation is made pursuant to FAR 6.302-1(c), for the acquisition of supplies or services determined to be reasonably available from only one source (e.g. brand name). The justification for the use of a brand name only description is as follows.

AK-225G is the only approved cleaning solvent for the verification of Volatile Organic Carbon and particulate contamination at Stennis Space Center. All current procedures used for cleaning use AK-225G for final rinse and verification. Components for rockets and rocket testing use very high pressure fuels and oxygen. Any amount of contamination, whether particulate or hydrocarbon, is a potential source of ignition which will start a fire with the oxygen and the metal pipes. Piping and components are cleaned and verification tested to be cleaned so that no hydrocarbon is detectable at above 5 PPM. The impact of not verifying an absence of hydrocarbons properly is the risk of a test stand or test article fire with an impact in the millions of dollars and a risk of loss of life. This verification process requires a solvent that is very clean, inorganically based, and aggressive to dissolving hydrocarbons. Changing from this fluid would require all procedures to be rewritten and approved and the procurement of significant capital equipment to support the different solvent. Further, SSC's testing equipment is validated to use only the AK-225 process, as it has been certified to be safe and effective for use in the referenced operating environment.

## **6.0 SOLICITATION EFFORTS**

Pursuant to NFS 1805.207, 1804.570, FAR 5.201, and SWI-5100-0007, a market research synopsis (RFI # NNS13ZDA004L) for possible suppliers was posted on 2/27/2013 on the NASA Acquisition Internet Service (NAIS) Business Opportunities website @ [http://prod.nais.nasa.gov/cgi-bin/nais/link\\_syp.cgi](http://prod.nais.nasa.gov/cgi-bin/nais/link_syp.cgi) and the Federal Business Opportunities (FedBizOpps) website @ <http://www.fbo.gov>. Interested organizations were asked to submit the capabilities of their product(s) to perform the effort, by 3/13/2013. Three firms responded. Two firms, one small business distributor and one large business U.S. manufacturer's representative, responded as authorized suppliers of the AK-225G solvent. A third firm, a small business, responded with an alternative product to be considered. The two AK-225G suppliers were firms known, through previous SSC purchases, to be capable of supplying the AK-225G solvent required by the announcement. The alternative product submission was evaluated and determined to be technically unacceptable, as the proposed product has not completed testing to determine its compatibility with SSC's systems. Both AK-225G suppliers also confirmed that the sole manufacturer for the AK-225G solvent is AGC Chemicals Americas AsahiKlin out of Japan, where the material is manufactured in Japan and shipped to the United States.

## **7.0 COST CERTIFICATION**

Both historical pricing and market research shall be used to determine that the proposed price is fair and reasonable.

## **8.0 MARKET SURVEY**

Alternative solvents are being reviewed. A trade study is currently under way to find and approve a replacement solvent for AK-225G, but the study is not yet complete. The study is scheduled to run for twenty-one months after the release of funding, which is pending. The study will include solvent efficiency testing, material compatibility testing (both metals and softgoods), autoignition testing, and oxygen impact compatibility testing. The study is a joint program between SSC and Marshall Space Flight Center (MSFC) with help from White Sands Test Facility (WSTF).

## **9.0 OTHER SUPPORTING FACTS**

The facts and market research noted above clearly demonstrate that no other solvent is available that can be used in the referenced operating environment. Therefore, it is determined that a brand name purchase, as justified herein, is the only option that can satisfy NASA's requirements for this solvent. Although the Government will be limiting competition as a result of specifying a brand name item, there are at least two suppliers who can provide the required product. As such, it is anticipated that this requirement will be competed among vendors determined to be capable of supplying the required product via issuance of two BPAs, where each call/order will be competed between the BPA vendors.

## **10.0 SOURCES EXPRESSING AN INTEREST IN THIS PROCUREMENT**

Market Research at this time indicates no other sources are available to provide subject requirement. All inquiries as a result of the synopsis issuance were addressed.

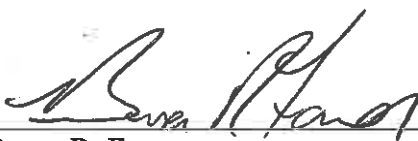
## **11.0 AGENCY ACTIONS TO REMOVE BARRIERS**

To remove or mitigate barriers to competition, SSC will continue to monitor the market for solvents that would be capable of operating under the conditions specified to ensure future procurements are conducted in an appropriately competitive environment.

## **12.0 TECHNICAL REPRESENTATIVE CERTIFICATION**

I do hereby certify that the support data under my cognizance that are included in this justification are accurate and complete to the best of my knowledge and belief. In addition, I certify that the anticipated price to the Government will be thoroughly evaluated to ensure that it is fair and reasonable prior to award. Comparison of pricing quoted will be balanced against market research of current prices and historical acquisition costs.

SUBMITTED BY:




Bruce R. Farner  
Technical Representative/RA20

5/13/13  
Date

### 13.0 CONTRACTING OFFICER CERTIFICATION

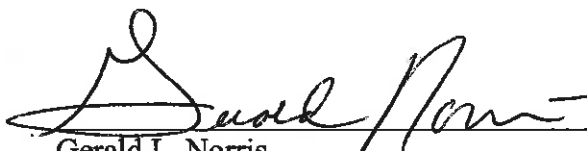
I do hereby certify that the above justification is accurate and complete to the best of my knowledge and belief. I concur with the above stated recommendation and determine that the circumstances of the contract action deem only one brand reasonably available. I further certify that the anticipated costs to the Government will be determined fair and reasonable prior to award.

CERTIFIED BY:   
Carol T. Burnside  
Contracting Officer /DA10


5/13/13  
Date

### 14.0 CONCURRENCE AND APPROVAL

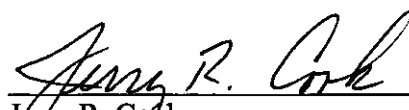
I hereby accept the above stated recommendation and determine that the circumstances of the contract action deem only one brand reasonably available. This certification is supported by the facts outlined herein as well as the market research synopsis posted on 2/27/2013 and the responses received from industry. Results received were addressed and a Brand Name procurement is determined to be necessary due to the reasons expressed herein.

CONCURRENCE:   
Gerald L. Norris  
Division Chief / DA10

5-13-13  
Date

CONCURRENCE:   
Robert S. Harris  
Procurement Officer/DA00

5-13-13  
Date

APPROVAL:   
Jerry R. Cook  
Center Competition Advocate/AA00

5.14.13  
Date